

1 E. BRENT BRYSON, ESQ.
2 E. BRENT BRYSON, LTD.
3 Nevada Bar No. 4933
4 3202 West Charleston Blvd.
5 Las Vegas, Nevada 89102
6 702-364-1234 Telephone
7 702-364-1442 Facsimile
8 Ebbesqltd@yahoo.com

9 *Attorney for Plaintiff*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 BRIAN CHURCH,) Case No. 2:19-cv-01198-RFB-DJA
13)
14 Plaintiff,)
15)
16 vs.)
17)
18 OFFICER LUCAS TURLEY, in his individual)
19 and official capacity; SGT DAVID MASON,)
20 in his individual and official capacity;)
21 LAS VEGAS METROPOLITAN POLICE)
22 DEPARTMENT; DOE OFFICERS I)
23 through X inclusive, DOES XI through XX,)
24 inclusive,)
25 Defendants.)
26)
27)
28)

29 **STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO**
30 **DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**
31 (FIRST REQUEST)

32 Pursuant to LR 7-1, Plaintiff BRIAN CHURCH ("Plaintiff"), by and through his counsel
33 of record, E. Brent Bryson, Esq. of the law offices of E. Brent Bryson, Ltd., and Defendants Las
34 Vegas Metropolitan Police Department ("LVMPD"), Officer Lucas Turley and Sgt. David
35 Mason (collectively "Defendants"), by and through their attorneys of record, Robert W.
36 Freeman, Esq., of the law firm of Lewis Brisbois Bisgaard & Smith, LLP., hereby submit their
37 stipulation, request and order extending Plaintiff's time to respond to Defendants' motion for
38

1 summary judgment by forty-five (45) days, up to and including Thursday, September 16, 2021.

2 Defendants' motion for summary judgment was filed on July 12, 2021. Plaintiff's
3 response is therefore due by or on August 2, 2021. The Parties hereby stipulate and agree to
4 allow Plaintiff an additional forty-five (45) days to respond by opposition, up to and including
5 September 16, 2021. In support of this stipulation and request, the Parties state as follows:

6
7 This request for an extension of time is not sought for any improper purpose or other
8 purposes of delay but because Plaintiff's Counsel must unexpectedly prepare for a trial that has
9 been rescheduled to commence on August 2, 2021, an earlier date as a result of prior COVID
10 related delays. This is the first request to allow Plaintiff additional time to respond. The parties
11 respectfully submit that the reasons set forth above constitute compelling reasons to allow the
12 Plaintiff additional time to respond by opposition to Defendants' motion for summary judgment.

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

Church v. Turley, et al

Case No.: 2:19-cv-01198-RFB-DJA

WHEREFORE, upon agreement by and between the parties, through their respective counsel, the undersigned counsel requests that this Court grant the parties' stipulation to extend time for Plaintiff to respond to Defendants' motion for summary judgment by an additional forty-five (45) days, up to and including September 16, 2021.

APPROVED AS TO FORM AND CONTENT this 23rd day of July, 2021.

By: /s/E. Brent Bryson


E. BRENT BRYSON, ESQ.
E. BRENT BRYSON, LTD.
Nevada Bar No. 4933
3202 West Charleston Blvd.
Las Vegas, NV 89102
Attorney for Plaintiff

By: /s/ Robert W. Freeman

Robert W. Freeman, Esq.
Lewis Brisbois Bisgaard & Smith, LLP
Nevada Bar No. 3062
6385 S. Rainbow Blvd., Suite 600
Las Vegas, Nevada 89118
Attorney for Defendants

IT IS SO ORDERED:

DATED this 23rd day of July, 2021.


RICHARD E. BOULWARE, II
United States District Court